

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
CANTON DIVISION**

IN RE:	:	
	:	Chapter 13
	:	
KENYATTA DONALD-RAY GINN,	:	Case No. 22-60993
MALLORY KYLE GINN,	:	
	:	Judge John P. Gustafson
Debtors.	:	
	:	

**RESPONSE TO TRUSTEE’S MOTION TO DISMISS FOR
FAILURE TO PROVIDE 2024 INCOME TAX RETURNS**

Now come Debtors Kenyatta Donald-Ray Ginn and Mallory Kyle Ginn, by and through the undersigned counsel, and respond to the Trustee’s pending Motion to Dismiss as follows:

- 1.) 2024 Tax Returns were provided to the Trustee via Trustee’s Document Delivery Portal on May 9, 2025.
- 2.) Debtors were three weeks beyond the tax filing deadline and assert excusable neglect. Debtors deny unreasonable delay in the administration of the case that is prejudicial to creditors.

WHEREFORE, Debtors respectfully request the Trustee’s motion be denied and another other relief this Honorable Court deems appropriate.

Respectfully submitted,

/s/Jonathon C. Elgin
Jonathon C. Elgin (0096390)
JC Elgin Co., LPA
6 Water St.
Shelby, OH 44875
567-275-1040
JC@JCElgin.com
Attorney for Debtors

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2025, a true and correct copy of the Motion to Dismiss Case and Notice thereof was served via the Court's Electronic Case Filing System upon these entities and individuals who are listed on the Court's Electronic Mail Notice List:

- Office of the United States Trustee at [RegisteredEmailAddress]@usdoj.gov
- Dynele L Schinker-Kuharich at DLSK@Chapter13Canton.com,
trusteeOHNB09@ecf.epiqsystems.com

and by regular U.S. mail, postage prepaid, upon:

Kenyatta Donald-Ray Ginn, Debtor
2000 Willowood Dr. N
Mansfield, OH 44903

Mallory Kyle Ginn, Debtor
2000 Willowood Dr. N
Mansfield, OH 44903

/s/Jonathon C. Elgin

Jonathon C. Elgin (0096390)